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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF YAVAPAI

THE STATE OF ARIZONA, Plaintiff, vs. **PHILLIP THOMAS DELANEY,** Defendant.	CAUSE NO. S1300CR202500879 Hon. Krista Carman Division 4 **NOTICE OF DEFENSES, WITNESSES AND REQUEST FOR DISCOVERY**

Defendant, by and through undersigned counsel and pursuant to Ariz. Crim. R. 15.2, hereby gives notice that the following specific defenses may be raised at trial:

1. GENERAL DENIAL
2. INSUFFICIENCY OF EVIDENCE
3. JUSTIFICATION

In support of the aforementioned defenses, defendant may call all or none of the following witnesses and will provide supplemental notice of further witnesses as they become known to defendant:

1. Defendant;
2. An expert witness to be designated through supplemental pleadings;
3. Additional persons who may be called as witnesses at trial, including their names, addresses, and all statements made by them in connection with the case, and each defense that their

testimony may support will be supplemented through supplemental pleadings as identified through additional investigation and case preparation;

4. Any and all individuals named or referred to in the preliminary hearing or grand jury transcript and/or police departmental reports in the State of Arizona's discovery;
5. Any and all individuals who have spoken with any of the State of Arizona's witnesses with reference to this case;
6. Any defense investigator.

In support of the aforementioned defenses, defendant may use the following documents, maps, diagrams, photographs, records, or other tangible objects:

1. Photographs of the defendant, the route taken by defendant, the scene of any alleged incident, arrest, or accident, as well as any other relevant photographs;
2. Maps, diagrams, charts, or studies relevant to the area in which the defendant was stopped, arrested, or involved in an accident;
3. Medical records, photographs, prescriptions, or other documentation and tangible evidence illustrating any medical conditions which may be relevant to the aforementioned defenses listed;
4. Manuals used by or known to any witnesses disclosed by the State;
5. Arizona Department of Health Services regulations;
6. Any and all physical or documentary evidence referred to in the departmental report, preliminary hearing transcript or grand jury transcript, and any supplemental evidence as may be developed through investigation and case preparation by the State and/or the Defense. Said material will be disclosed by the Defense upon identification and determination of use at trial.

At the time of trial, other papers, documents, or other tangible objects may be used in support of each of the above defenses. The defense reserves the right to supplement this pleading with additional witnesses and evidence as it becomes known.

REQUEST FOR DISCOVERY

Further, pursuant to Ariz. Crim. R. 15.1, defendant hereby requests all discovery materials including disclosures of the names and addresses of all persons who will be called as witnesses in the State of Arizona's case-in-chief or in its rebuttal case, together with their written or recorded statements, photographs, digital evidence, body-worn camera, dash cam video or other electronic media.

Respectfully submitted this 2nd day of December, 2025.

By: _____

L. Matthew Springer
State Bar No. 021338
Attorney for Defendant

Original of this document e-filed this date with:
Clerk of Superior Court

A copy of this document e-mailed
the same date to:
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